

EXHIBIT 59

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

DECLARATION OF REBECCA THOMPSON

I, Rebecca Thompson, declare the following to be true and correct under penalty of perjury under the laws of the state of Washington.

1. I am over the age of 18, competent to testify, and make the following statements based on my personal knowledge.

2. I currently work as Director of Student Financial Assistance for the Washington Student Achievement Council (WSAC). I have held this position since July 1, 2015.

3. I am familiar with the federal government's Deferred Action for Childhood Arrivals (DACA) policy, which is an immigration-related policy that was adopted in June 2012.

4. My job responsibilities include oversight of Washington State's higher education financial aid programs, including the Washington State Need Grant (SNG), Washington State Work-Study (SWS), and College Bound Scholarship (CBS).

5. DACA students can apply for Washington State financial aid programs using a free application form known as the Washington Application for State Financial Aid (WASFA) that WSAC administers.

6. Although noncitizens are generally ineligible for CBS, SWS and resident ("in-state") tuition rates many students fitting this description are eligible for SWS, CBS, and resident tuition rates because of the protections afforded by DACA, so long as they meet the residency requirements established by Washington State law.

7. The WASFA permits applicants to self-disclose their Deferred Action for Childhood Arrivals (DACA) designation for the purpose of determining eligibility for in-state tuition and state financial aid programs.

8. Tuition for qualifying DACA students at institutions of higher education in Washington State is at the residential or "in-state" rate.

9. WSAC is aware of at least 1443 DACA students attending institutions of higher education who also applied for financial aid in Washington State as of the 2016-17 school year.

Dated this 5th day of September 2017 in Tacoma, Washington.

Rebecca M Thompson

Rebecca Thompson
Director of Student Financial Assistance
Washington Student Achievement Council